

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHIRLEY SHEPARD and ANDREA SHEPARD,

No.: 10cv 7551 (RJS)

NOTICE OF MOTION

Plaintiffs,

-against

THE ASSOCIATED PRESS, ESPN, INC.,
KURTIS PRODUCTIONS, LTD., PICTOPIA.COM,
INC., PHILLY ONLINE, INC. and PHOTOBUCKET.
COM, INC.

Defendants.

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S I R S:

PLEASE TAKE NOTICE, that upon the annexed affirmation of CHARLES C. DESTEFANO, ESQ., dated the 1st day of December, 2010 and upon all the pleadings and proceedings heretofore had herein, a motion will be made before this Court, the Honorable Richard J. Sullivan, United States District Court for the Southern District of New York, held at the Courthouse located at 500 Pearl Street, New York, New York pursuant to the Order of Judge Sullivan dated November 19, 2010, granting the undersigned leave to file a motion pursuant to Local Rule 1.4 to withdraw as counsel for the plaintiffs; together with and for such other and further relief the Court deems just and proper.

Dated: Staten Island, New York

LAW OFFICE OF CHARLES C. DESTEFANO

_____/s/
Charles C. DeStefano(CD 0150)
Attorney for Plaintiffs
1082 Victory Boulevard
Staten Island, New York 10301

TO: Andrew L. Deutsch, Esq.
DLA Piper
Attorneys for Defendants
Associated Press and ESPN

Michael Kuritzkes, Esq.
Philadelphia Media Network
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Mark Lerner, Esq.
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NBC Universal Inc.
Attorneys for Defendant Kurtis Production, Ltd.

Jack Russo, Esq.
Computerlaw Group, LLP
Attorneys for Defendant Pictopia

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHIRLEY SHEPARD and ANDREA SHEPARD,

No.: 10cv 7551 (RJS)

AFFIRMATION

Plaintiffs,

-against

THE ASSOCIATED PRESS, ESPN, INC.,
KURTIS PRODUCTIONS, LTD., PICTOPIA.COM,
INC., PHILLY ONLINE, INC. and PHOTOBUCKET.
COM, INC.

Defendants.

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CHARLES C. DESTEFANO, an attorney duly licensed to practice law before the
Courts of the State of New York, hereby duly affirms to the following under the penalties
of perjury:

1. I am the attorney for the above-captioned plaintiffs and make this affirmation in
support of the instant motion to withdraw as counsel for the plaintiffs SHIRLEY
SHEPARD and ANDREA SHEPARD.

2. Your affirmant was contacted by plaintiffs SHIRLEY SHEPARD and
ANDREA SHEPARD to represent them in their attempt to collect monies owed to them
by the defendants herein for the use and reproduction of their artwork.

3. Your affirmant explained to the plaintiffs SHIRLEY SHEPARD and ANDREA
SHEPARD that his practice is primarily in the area of personal injury. However, plaintiffs
insisted they wanted your affirmant to represent them.

4. A formal retainer was never signed. However, due to the friendly relationship
between the undersigned and the plaintiffs, a complaint was prepared and filed with this

_____/s/_____
CHARLES C. DeSTEFANO, ESQ.(CD1050)